JUDGE KATHLEEN CARDONE

FILED

AO 243 (Rev. 01/15)

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MOTION UNI	DER 28 U.S.C. § 2255 TO V	ACATE, SET ASIDE	3, OR CORRECT WEST	TK, U.S. DIS VAICT OF	LERK
	INTENCE BY A PERSON II	N FEDERAL CUSTO	ODY BY		5 / S
United States District Cou	rt Distric	t Western T	District o	+ Texas	YTY
Name (under which you were convicted):			26	Thomas	e#
Veronica Martinez (arrera Vercz	<u> </u>	290	33613	
Place of Confinement:	.,	EQU	Case#	201 1606	
PILE Cars	well-Texas.			<u> 286-KCG</u>	21/
UNITED STATES OF AMERICA	4	•	de name under which c	•	
	"Verc	snica Mart	inez Car	rera-Ben	<u>-2</u>
	мотю	DN EP	200	VO1	22
1. (a) Name and location of c	ourt which entered the judgn	nent of conviction you	u are challenging	g:	
Western	District of	Texas			
					-
	e number (if you know):			16 - JEC C3	シ
2. (a) Date of the judgment of	f conviction (if you know):	May 16	6, 201°	<u> 7</u>	_
	May 16.		<u> </u>		_
3. Length of sentence:	288 M	ntls.			
4. Nature of crime (all count	s): 21:846, 84K)	BXIXA) 85	YICA)(I)	3 851- Ce	risp.
TO POSSESS 5KG C	a Mon of M	the of	Substan	ce Contai	Lug
retectable Amoun 341(A)(1) 3, 851	t of Cocaine	; 21: 846	5 8416	B) (1) <1),
341(A)(1) 3 851	Conspiraly to	Dessess is	50600	More Cor	tain, a
a detectable	amount of	Nethan	npheta	mine 3	Denis .
Release Violation of 5. (a) What was your plea?	(Check one)	56 - Maney	Thunderin	j	<u></u> -
(1) Not guilty	(2) Guilty	(3)	Nolo contendere	e (no contest)	
	plea to one count or indictme		plea to another c	ount or	
what did you plead guilty	to and what did you plead no	ot guilty to?	•		
	•				•
			·	· .	:/
6. If you went to trial, what	kind of trial did you have? (Check one) //	Jury	Judge only	
7. Did you testify at a pretrie	al hearing, trial, or post-trial i	nearing? Yes [No 🔀	
8. Did you appeal from the j	udgment of conviction?	Yes	No		

g. Movent Did	not File a Petition for Certionari in the US Symme Court.
(1) Doc	ket or case number (if you know): (2) Result:
(3) (4) C	Date of result (if you know):tation to the case (if you know):(5) Grounds raised:
10. Other than the dir	ect appeals listed above, have you previously filed any other motions, petitions,
or app	lications concerning this judgment of conviction in any court? Yes No Ir answer to Question 10 was "Yes," give the following information:
(2) Doo	(a)(1) Name of court: Western District of Leas. ket or case number (if you know): <u>EP:17-CR-01286-KC3)</u>) Date of filing (if you know): <u>Approximately April 9</u> , 2020 1) Nature of the proceeding: <u>3582 (CXIXA) Compassionale Release</u> for Corona Vires.
	Health Issues a long with Extraordinary and Compelling
	Circums fances
(8	hearing where evidence was given on your motion, petition, or application? Yes (7) Result: None as of today date Date of result (if you know):
(b) If you filed (2) Doo	any second motion, petition, or application, give the same information: (1) Name of court: Orker Motions Filed (ket or case number (if you know):
	3) Date of filing (if you know):4) Nature of the proceeding:(5) Grounds raised:
(6) Did vou receive a	hearing where evidence was given on your motion, petition, or application?
(5) Did 350 1550115 C	(7) Result:
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(8) Da (c) Did you appeal to a fede	te of result (if you know):
(1) First Y No > petition: e s	10.
(2) Second Y No 7 7 petition: e	
(d) If you did not appeal f	rom the action on any motion, petition, or application, explain briefly why you did not: Pas/Cons of filing on Appen.
12. For this motion, sta Constitution, laws, or tre	te every ground on which you claim that you are being held in violation of the aties of the United States. Attach additional pages if you have more than four accepted because the grounds. State the facts supporting each ground.
movat of excessed CI's Intern	
	10 grans of pure methomphetanine.
In the olea regreenen.	the 7th Circuit Crait Sayor 200
under the Actual Amount under the Cat's Ger Attached Case	(b) Direct Appeal of Ground One: (1) If you appealed from the judgment of conviction, did you raise this issue? Yes No
	raise this issue in your direct appeal, explain why: The An Agree of Counsel. (c) Post-Conviction Proceedings: Did you raise this issue in any post-conviction motion, petition, or application? Yes No
She go one (1)	Did you raise this issue in any post-conviction motion, petition, or application? Yes No (2) If your answer to Question (c)(1) is "Yes," state: Type of motion or petition:
Name and location	of the court where the motion or petition was filed: Docket or case number (if you know):
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	Date of the court's decision:
Result (attach a	copy of the court's opinion or order, if available):
	(3) Did you receive a hearing on your motion, petition, or application?
	(4) Did you appeal from the denial of your motion, petition, or application? Yes
(5) If	your answer to Question (c)(4) is "Yes," did you raise this issue in the appeal? Yes
·	(6) If your answer to Question (c)(4) is "Yes," state:
Name an	d location of the court where the appeal was filed:
	Docket or case number (if you know):
	Date of the court's decision:
Result (attach a	copy of the court's opinion or order, if available):
(T) If	
(7) If your answer to Qu	estion (c)(4) or Question (c)(5) is "No," explain why you did not appeal or raise this issue:
1 . C in used and ob	toined from the illegal warrant to
The intermetion locator:	a formation is a violation GROUND TWO: At Fourth Amendment Rights. Do not argue or cite law. Just state the specific facts that support your claim.):
btain CPNI/CEII Photo Defendam	The not argue or cite law Just state the specific facts that support your claim.):
(a) Supporting facts (Do not argue of cite law. Just state the specific facts that support your ordinary.
The government violeted the	Desendants 4th Amendment Rights
The government viole tes fine to Brivary when it failed ?	to Obtain a Warrout from
o privacy convers	mly a Coust authorized "warrant
he Cellular Phase Superf	C 11 Corp. 585 U.S (2018)
The for under Corporter	My a Coust 40thorized Warrant Supreme Coust Cade 585 U.S (2018) all sufficient obtained we Tree Dictrine must The Dictrine must The Dictrine must The Dictrine must
we rest is iralik and	all Jasomas III of must
the wit of the Poison	(b) Direct Appeal of Ground Two:
the wallest is iralia harmout.	(5) Direct Appeal of Ground Two: (1) If you appealed from the judgment of conviction, did you raise this issue? Yes No
יששונה אולו ל	Yes(No
(2) If you did not	raise this issue in your direct appeal, explain why:
Alban Malte File.	For Appeal or Fig. W
Afforkey garles Apreal	with Describent. (c) Post-Conviction Proceedings:
Prost cons of my (1)	Did you raise this issue in any post-conviction motion, petition, or application?
Inestection Assistance of Counsel.	raise this issue in your direct appeal, explain why: For Appeal of the grown (c) Post-Conviction Proceedings: Did you raise this issue in any post-conviction motion, petition, or application? Yes No. (2) If your answer to Question (c)(1) is "Yes," state:
·	(2) If your answer to Question (c)(1) is "Yes," state: Type of motion or petition:
Name and location	of the court where the motion or petition was filed:
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Docket or case number (if you know):
Date of the court's decision:
Result (attach a copy of the court's opinion or order, if available):
(3) Did you receive a hearing on your motion, petition, or application?
(4) Did you appeal from the denial of your motion, petition, or application?
(5) If your answer to Question (c)(4) is "Yes," did you raise this issue in the appeal? Yes No
(6) If your answer to Question (c)(4) is "Yes," state: Name and location of the court where the appeal was filed: **PolyA**** Name and location of the court where the appeal was filed: **PolyA**** Name and location of the court where the appeal was filed: **PolyA*** **PolyA** **PolyA
Docket or case number (if you know):
Date of the court's decision:
Result (attach a copy of the court's opinion or order, if available):
(7) If your answer to Question (c)(4) or Question (c)(5) is "No," explain why you did not appeal or raise
this issue:
efendants & Horney failed to Ask Defendant; f She would She go over the Pros GROUND THREE: Lo Sik a Appeal nor did and Cons of Filing An Appeal. (a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim.):
See don tis & Horney failed to ASK Doubthe Pres GROUND THREE:
Lo Sik a Appeal nor did and cons of Filir An Appeal.
(a) Supporting facts (Do not argue of cite law. Just state the specific facts that support your claim.)
I dis All com is Required by law to File a Notice
Defendants Afformed is also
Appeal for her Client. Pas and Cons of Jiling an
wined to go over the westitled to an evidentiary
Desendant sendant send
this issue See United State 10th C: 16th) (b) Direct Appeal of Ground Three:
(a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim.): Defendant's Atterney is Required by law to File a Notice Appeal for her Client. The Atterney is also Printed to go over the Present the Cons of filing an Printed to go over the Present the dean evidentiary peal. Defendant See United States v. Hering (2019) Keeing on this issue. See United States v. Hering (2019) (1) If you appealed from the judgment of conviction, did you raise this issue? Yes No.
(2) If you did not raise this issue in your direct appeal, explain why:
Atterney Faiked to go over Pris/Cons of Appeal
or to Tile Notice of Intest To Apost (c) Post-Conviction Proceedings:
Afterney Faiked to go over Pres/Cons of Appeal or to File Notice of Intent To Appeal (c) Post-Conviction Proceedings: effective Assistanced (1) Did you raise this issue in any post-conviction motion, petition, or application? Yes No
Coursel.
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(2) If your answer to Question (c)(1) is "Yes," state
Type of motion or petition:
Name and location of the court where the motion or petition was filed:
Docket or case number (if you know):
Date of the court's decision:
Result (attach a copy of the court's opinion or order, if available):
(3) Did you receive a hearing on your motion, petition, or application Yes
(4) Did you appeal from the denial of your motion, petition, or application Yes
(5) If your answer to Question (c)(4) is "Yes," did you raise this issue in the appeal Yes ◀
(6) If your answer to Question (c)(4) is "Yes," state
Name and location of the court where the appeal was filed:
Docket or case number (if you know):
Date of the court's decision:
Result (attach a copy of the court's opinion or order, if available):
(7) If your answer to Question (c)(4) or Question (c)(5) is "No," explain why you did not appeal or rais this issue:
Defendant's 85/ Enhancement is invalid due by the fact that one of the Changes was 19 years and. GROUND FOUR: (a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim.
To 1 1'c 85/ Enhousement is invalid all
b) endances of the changes was 19 years old, GROUND FOUR:
6 the fact that one of
(a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim. Defendent received a charge under 851 enhancement was I previous Charges that Icol to the 851 enhancement was A previous Charges that Icol to the 851 enhancement was
have under 85/ on hancement. One of
etendent received a charge the 851 enhancement was
convious Charges that Ical to the 83
Describe Sentence from June 233
conspiracy to Passess Chaine Sentence from June 23, 2000 mne Conspiracy to Passess Chaine Sentence from Defendant's 5/16/2019 sentencing
las 15 years old at the tracking factors under Books
1 14 least Under 33 34 minigation
ite. At the close to try to mitigate her points?
afterney had the Charac being 19 years old. (b) Direct Appeal of Ground Found
(1) If you appealed from the judgment of conviction did you raise this issue
conspiracy to Passess (Laine sentence from June 23, 2000 mm. Conspiracy to Passess (Laine sentence from June 23, 2000 mm. Conspiracy to Passess (Laine sentence from June 23, 2000 mm. Len 15 years old at the time of Defendant's 5/16/2019 sentencing Len 15 years old at the least Under 3555a) mitigating factors under Boulea Let. At the least Under 3555a) mitigate her points to a rathracy had the charge being 19 years old. (b) Direct Appeal of Ground Four wer level due to the Charge being 19 years old. (1) If you appealed from the judgment of conviction, did you raise this issue Yes &
(2) If you did not raise this issue in your direct appeal, explain why:
All Cil Alexander to the test to
Attorney failed to tike Notice to Ithing
Acres of to go over Pres/Cons of Appeal WITT
Afterney failed to fik Notice as Intent to Appeal or to go over Pres/Cons of Appeal with 410cr 110 Deles land.
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	(c) Post-	Conviction Proceedings:
(1)	Did you raise this issue in any post-conviction motion	on, petition, or application?
	(2) If your answer to Qu	estion (c)(1) is "Yes," state:
	Type of motion or petition:	NA
Name and location	Type of motion or petition: of the court where the motion or petition was filed:	
	Docket or case number (if you know):	
	Date of the court's decision:	
Result (attach	a copy of the court's opinion or order, if available):	
	(3) Did you receive a hearing on your moti	Yes Mg/
	(4) Did you appeal from the denial of your moti	on, petition, or application? Yes (No.
(5) If	your answer to Question (c)(4) is "Yes," did you rai	
	(6) If your answer to Ou	estion (c)(4) is "Yes," state:
Name ar	nd location of the court where the appeal was filed:	N/A
	Docket or case number (if you know):	
	Date of the court's decision:	
Donalt (attack	a copy of the court's opinion or order, if available):	
Result (attach	a copy of the court's opinion of order, if available).	
(7) If your answer to Qu	uestion (c)(4) or Question (c)(5) is "No," explain why this issue:	you did not appeal or raise
·		het very herre net proviously
presented in some federal Mone Previously 15+2255	13. Is there any ground in this motion t court? If so, which ground or grounds have not bee reasons for not presenting them:	n presented, and state your
More orcano		
15+ 2255		
	•	•
	motion, petition, or appeal <u>now pending</u> (filed and r for the judgment yo	ou are challenging?
If "Yes," state the nam	ne and location of the court, the docket or case num and the issues raised.	ber, the type of proceeding,
		NIA
•	•	•
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15. Give the name	and address, if known, of each attorney who repre	sented you in the following
	stages of the judg	gment you are challenging:
	(a) At preliminary hearing:	Myssen.
		S. BURN
	(b) At arraignment and plea: _	S. BURN
	_	
	(c) At trial:	N/A
	(d) At sentencing:	S, BUNA
	(e) On appeal:	_ <i>D</i> /A
		() (4
	(f) In any post-conviction proceeding:	\mathcal{N}/A
(g) On appeal from any r	uling against you in a post-conviction proceeding:	
16. Were you sentenced	on more than one count of an indictment, or on m	ore than one indictment, in
	the same court and	at the same time? Yes (40)
17. Do you have any fo	uture sentence to serve after you complete the sen	tence for the judgment that
	yo	ou are challenging? Yes
(a) If so give name and	location of court that imposed the other sentence	you will serve in the future:
(a) 11 55, give name and		N/K
(b) Give the date the other sentence was imposed:	
\	(c) Give the length of the other sentence:	•
(d) Hove you files	d, or do you plan to file, any motion, petition, or app	plication that challenges the
(a) Have you med	judgment or sentence to be se	nyed in the future? Yes No
40 TIMELINESS OF	MOTION: If your judgment of conviction became f	inal over one year ago. You
18. TIMELINESS OF	year statute of limitations as contained in 28 U.S.	8 2255 does not har your
		motion. *
15+2)5	3-Timple Eiled within	monon.
131 00	5-Timely Filed within Sentencing	
1/2 - 1	1 C. Lania	
1/20101	Savare	
0		
	•	
		•
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hearing	Therefore, mo	vant asks that the Court grant the following relief: Cryedited cuidentia Sentence reduction.
U		or any other relief to which movant may be entitled.
	I declare (or certify, ver that th	Signature of Attorney (if any) signature of Attorney (if any) if y, or state) under penalty of perjury that the foregoing is true and correct and is Motion Under 28 U.S.C. § 2255 was placed in the prison mailing system on (month, date, year). Executed (signed) on 430 20 (date).
	If the person signing is no	Signature of Movant of movant, state relationship to movant and explain why movant is not signing this motion.
		my
		•

restrictions and terms and conditions of the Matthew Bender Master Agreement.

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1	February o	or March 2016.
2	M	IS. NEWAZ: During your investigation of this
3	organizati	on, what are the methods that you utilized in order
4	to investi	gate it?
5	A	GENT GAMEZ: We used multiple wire intercepts, GPS
6	data locat	ion, and cooperating defendants and sources.
7	M	MS. NEWAZ: You mentioned wiretaps. Is this
8	wiretappin	ng of individual phones?
9	A	AGENT GAMEZ: Yes, ma'am.
10	M	MS. NEWAZ: You also wiretapped individuals Facebook
11	accounts;	is that right?
12	7 5	AGENT GAMEZ: That's correct.
13	<u>r</u>	MS. NEWAZ: Did you have wire intercepts on devices
14	utilized k	oy Ms. Carrera Perez?
15	P	AGENT GAMEZ: Yes, ma'am.
16	4	MS. NEWAZ: Numerous?
17	F	AGENT GAMEZ: Yes, ma'am.
18	1	MS. NEWAZ: And during these wire intercepts and based
19	on your in	nvestigation, were you able to identify members of
20	this organ	nization?
21]	AGENT GAMEZ: Yes.
22	. 1	MS. NEWAZ: Recently an indictment was handed down in
23	this part:	icular case; is that right?
24	1	AGENT GAMEZ: Correct.
25	Ī	MS. NEWAZ: About how many people have currently been
	1	

1		AGENT GAMEZ: Yes.
2		MS. NEWAZ: And they would enter back into the
3	United St	ates? .
4		AGENT GAMEZ: Yes.
5		MS. NEWAZ: And they would transport the narcotics to
6	destinati	on cities?
7		AGENT GAMEZ: Correct.
8		MS. NEWAZ: In this particular investigation, what are
9	the desti	nation cities where drugs have been destined to that
10	you actua	ally seized?
11		AGENT GAMEZ: Primarily it was Chicago. We seized
12	towards A	Itlanta and Wichita.
13		MS. NEWAZ: Let me focus in on Ms. Carrera Perez.
14	During al	l of these different seizures that you talked about
15	with all	of these different narcotics, what was her role, what
16	was she d	doing? I know you will answer this based on what you
17	know from	wire intercepts and your overall investigation.
18		AGENT GAMEZ: She was the recruiter that would recruit
19	the cour	ers to transport the narcotics. She would also
20	oversee 1	the delivery of the narcotics.
21		MS. NEWAZ: Would she provide all of these people
22	instruct	ions on what they were supposed to do?
23		AGENT GAMEZ: Yes.
24		MS. NEWAZ: Where they were supposed to go?
25		AGENT GAMEZ: Yes.

1		
1	your inve	stigation of this organization maintain constant
2	contact w	ith the source of supply of these narcotics in
3	Michoacan	, Mexico?
4		AGENT GAMEZ: Yes.
5		MS. NEWAZ: What are the ways in which she would
6	maintain	contact with the source of supply?
7		AGENT GAMEZ: Via phone, Facebook, WhatsApp.
8		MS. NEWAZ: And you in your investigation had evidence
9	of her ta	lking on the phone to the source of supply in
10	Michoacan	; is that right?
11		AGENT GAMEZ: Yes.
12		MS. NEWAZ: And also communicating via Facebook with
13	the source	e of supply?
14		AGENT GAMEZ: Yes.
15		MS. NEWAZ: When she went to Michoacan, did she
16	personall	y meet with the source of supply?
17		AGENT GAMEZ: Yes.
18		MS. NEWAZ: I want to talk to you a little bit was
19	Ms. Carre	era Perez at least, in part, a focus of your
20	investig	ation?
21		AGENT GAMEZ: Yes.
22		MS. NEWAZ: During this investigation, you said it
23	lasted e	arly 2016. Is it through the present?
24		AGENT GAMEZ: Correct.
25		MS. NEWAZ: You were intercepting Ms. Carrera Perez on

1	her phone; is that correct?
2	AGENT GAMEZ: Correct.
3 -	MS. NEWAZ: For many months? 🕊
4	AGENT GAMEZ: Correct.
5	MS. NEWAZ: Did you while you were intercepting
6	communications, did you intercept communications relating to
7	her child?
8	AGENT GAMEZ: Yes.
9	MS. NEWAZ: Two incidents involving her child?
10	AGENT GAMEZ: Yes.
11	MS. NEWAZ: Did Ms. Carrera Perez take her child to
12	Michoacan with her?
13	AGENT GAMEZ: Yes.
14	MS. NEWAZ: Was this child present when
15	Ms. Carrera Perez would meet with the source of supply?
16	AGENT GAMEZ: Yes.
17	MS. NEWAZ: Did Ms. Carrera Perez take this child
18	along with her in her drug trafficking efforts?
19	AGENT GAMEZ: Yes.
20	MS. NEWAZ: Tell me with regard to intercepts that you
21	were there situations where you intercepted communications
22	where you were worried about the welfare of this child?
23	AGENT GAMEZ: Yes.
24	MS. NEWAZ: Give me an example.
25	AGENT GAMEZ: One of the very first ones is we

1	what you know about, I guess, their living situation. I think
2	with regard to Ms. Carrera Perez, you testified a bit about
3	McAllen, Texas. Does she also reside here in El Paso, Texas?
4	AGENT GAMEZ: Yes.
5	MS. NEWAZ: Some of these drug trafficking, the
6	planning and different incidents, did they take place here in
7	El Paso?
8	AGENT GAMEZ: Yes.
9	MS. NEWAZ: Did she also or did she have a residence
10	in McAllen, Texas as well?
11	AGENT GAMEZ: Yes.
12	MS. NEWAZ: During your intercepts of her
13	communications on the telephone, did you find out and
14	understand she spent significant portions or periods of time in
15	Mexico?
16	AGENT GAMEZ: Yes.
17	MS. NEWAZ: How long would she go over there for
18	sometimes?
19	AGENT GAMEZ: At times it would be a couple of days,
20	and at times it would be a week or more.
21	MS. NEWAZ: You also pulled crossing history at least
22	previously in your investigation of this case, correct?
23	AGENT GAMEZ: Yes.
24	MS. NEWAZ: Can you give this Court an approximation
25	of how often Ms. Carrera Perez personally was traveling over

1	asked why	he was there. I explained the charges against him.
2	We told h	im the reason we had questions as far as his drug
3	trafficki	ng activities. He stated he was not a drug
4	trafficke	r. At that point, the interview ended.
5		MS. NEWAZ: I pass the Witness.
6		THE COURT: Ms. Bunn?
7		MS. BUNN: Thank you.
8	What	was the specific date of the commencement of this
9	investiga	tion?
10		AGENT GAMEZ: February 2016.
11		MS. BUNN: Do you have a date in February 2016?
12		AGENT GAMEZ: I do not.
13		MS. BUNN: Did you begin this investigation or did
14	another	agent begin this investigation?
15		AGENT GAMEZ: Another agent.
16		MS. BUNN: How do you know it began in February 2016?
17		AGENT GAMEZ: Based on documents and speaking to the
18	other ag	
19		MS. BUNN: So, this comes off hearsay and what you
20	read tha	t others have said, right?
21		AGENT GAMEZ: Correct.
22		MS. BUNN: It is not your own personal information
23	that you	yourself know firsthand, correct?
24		AGENT GAMEZ: When it started?
25		MS. BUNN: Yes, ma'am.

ı	
1	AGENT GAMEZ: As far as the date it started, that's
2	the information I have of the date, yes.
3	MS. BUNN: What specifically transpired in the
4	investigation that made Ms. Martinez a subject in this case?
5	AGENT GAMEZ: She was first I guess they first
6	started investigating Ms. Carrera Perez while she was
7	intercepted in another investigation.
8 -	MS. BUNN: So, she was being intercepted. Intercepted
9	how?
10	AGENT GAMEZ: There was a court authorized wire
11	intercept on a different target in a different investigation
12	that Ms. Carrera Perez was intercepted on.
13	MS. BUNN: Were you initially involved in that
14	investigation?
15	AGENT GAMEZ: I came to be involved in that
16	investigation, yes.
, 17	MS. BUNN: But you were not involved when it was
18	originally intercepted, correct?
19	AGENT GAMEZ: No.
20	MS. BUNN: Were you the agent that was personally
21	involved when Ms. Martinez was intercepted?
22	AGENT GAMEZ: During that time, no.
23	MS. BUNN: How did you find out about that?
24	AGENT GAMEZ: I listened to the intercepts, and,
25	again, I read the reports and have spoken to the case agents on

Affidavit Adendum Evis Torac Carillo POD: 802B So# 4522715 Die: 4-23-2020 XX 5/29/90 On March 1th 2020 on or About the hours of 6:45pm T was hosed in 700 BO. I was the dow room, I decided to rough out to the inmates, and explain to them that I was king myself last of the Chao Tango Picon Crange To Start o Cresh now the and to believe myself but to tricky or a changed individual. After I explained my deporture the Chiatango Prison Grang I was aggresively appropriate by several inmakes with owner challenging me to a fight. When I declined the regrest about a observ more immites approached using protonal language forcing me against my will to fight As the stustion escalated CM Figirous addressed the tank and asked lif there was any problems, the Tany in 120 130 he left which it at the same time being the and of his shift and officer Covered Host inchange of the PM chiff. As CPI Figirous Meft the POD inmite Alejandro Craytan approxiched no from behind and street me with his right hand a Jozon other inmales followed soot and Continued the Soulal Assault From my own browledge thefere + herome unconxidus to was carried in to room 27 where I was killed Domhad and stamped on by other inmates. Being the last thing I remember before wolking up thrown in the shower and left to more serious injuries When I awake I was harding from my have nose, ears, and mouth later facing at of I had hemriging from my brain and more. Looding to never damage in my left eye

the time Officer Conejudo did his POT chack 45 min had post after my Assault. easing me at risk for a long period time to where something worse and have happoned Maybe own couring death. After Conglishe being an Officer at the El Poso County Jail Annex noticed my injurys he escorted me out of 700 130 to the informary. After the rurges took my vitals they noticed my vitals threatming point to where they made a decision to Providence East Invaled Paso Texas East Side division. I Girtly remember my visit to the Inspital due to the fact where It was highly situated by the prescriptions I was given. I'm asking that you all slace take my lawsit sometimes and sack justice in my habolt. After I was Grow the thospital I was taken back to the El Pago County bail Annex located on 12501 Montana Ave by Officer Hout and Office Nortinoz. After my vitals, were charke to POD 1020 where I was record again with "X Charo Tango" imakes To at that they were all still very orthe thro tunor Clong therebors leaving my life of viel again to hope my out reach for help this situation is taken serious and soughtime threw in a processional matter. Thank you for upor time and concern. an my Askalt SCIT. Symbolie relised to call mir emagency form what happen to me going them at the El Poso bondy Jail Amex Stattmembers being very unprocessional

Les mas Carroba (2009, 29033:013 UDGERNIMLEZN CAR Ful Cassaull 1 ". " F.O. Box 27127 A. Wath Sx 26127



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